

**VOLKSWAGEN**



VIA FEDERAL EXPRESS

September 10, 1996

Office of the General Counsel

3800 Hamlin Road  
Auburn Hills, MI 48326  
Tel. (810) 340-4786  
Fax (810) 340-4851

Joseph Consentino, OSC  
Removal Action Branch  
Emergency and Remedial Response Division  
U.S. Environmental Protection Agency, Region II  
2890 Woodbridge Avenue  
Edison, NJ 08837

**Re: Request for Information Pursuant to Section 104(e) of CERCLA  
relating to Bayonne Barrel & Drum Superfund Site,  
15-154 Raymond Boulevard, Newark, Essex County, New Jersey**

Dear Mr. Consentino:

This will confirm receipt of EPA's information request pursuant to Section 104(e) of CERCLA regarding the above identified Superfund site.

The information request inter alia seeks information relating to the relationship of Volkswagen of America, Inc. (VWoA) to Bayonne Barrel & Drum Company in conjunction with the disposal, treatment or storage of any barrels, drums or other containers of unspecified materials.

VWoA has been the importer and distributor of Volkswagen automobiles and replacement parts therefor since it was founded in 1955 and has distributed Audi automobiles since at least 1970. At various times VWoA has conducted manufacturing and assembly operations in the United States, including a metal stamping plant, an air conditioning component plant and a motor vehicle assembly plant which was located in New Stanton, Pennsylvania and was operated from 1978 through 1988.

VWoA's files relating to its manufacturing operations in the past, to the extent these files still exist, are not organized in a manner permitting access to documents relating to Bayonne Barrel & Drum Company, if such documents should be in VWoA's possession. A search for responsive documents and information is virtually impossible without information as to location, time and nature of the product which was allegedly the subject of transactions between VWoA and Bayonne Barrel & Drum. Moreover, virtually every employee once associated with VWoA's manufacturing operations has left the employment of VWoA and in many instances are not conveniently found.

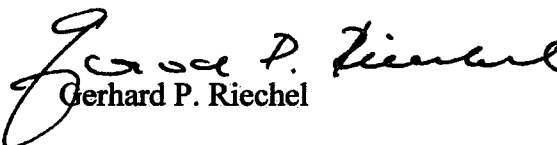
464302



I have twice unsuccessfully attempted to telephone EPA at the telephone number set forth in the letter of August 13, 1996 and have not been able to reach any person or received any return call upon leaving messages. The purpose of these telephone calls was to seek copies of any documents which may be in EPA's possession which could provide a nexus between VWoA and Bayonne Barrel & Drum. Without such documentation, there is no practical way for VWoA to identify reasonable parameters for a document search or information gathering effort focused upon the relationship between VWoA and Bayonne Barrel & Drum if such a relationship ever existed.

I look forward to your telephone call or a transmittal of any nexus documents on the basis of which you have identified VWoA as an entity which may have had a relationship to the superfund site in question. You can reach me by telephone at (810) 340-4785.

Sincerely,

  
Gerhard P. Riechel

cc: Marc Seidenberg, Esq.  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region II  
290 Broadway, 17th Floor  
New York, NY 10007

Bayonne